

Ismail Aaron Mora  
FULL NAME

COMMITTED NAME (if different)

Corcoran State Prison

FULL ADDRESS INCLUDING NAME OF INSTITUTION

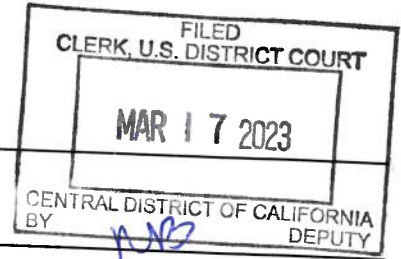
P.O. Box 3476

Corcoran, CA 93212

PRISON NUMBER (if applicable)

CDC # BM6614

First Amended Complaint



UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Ismail Mora

PLAINTIFF,

v.

Sheree Williams et al,

DEFENDANT(S).

CASE NUMBER

5:22-cv-02267-CJC-DFM

To be supplied by the Clerk

CIVIL RIGHTS COMPLAINT

PURSUANT TO (Check one)

☒ 42 U.S.C. § 1983

☐ Bivens v. Six Unknown Agents 403 U.S. 388 (1971)

A. PREVIOUS LAWSUITS

1. Have you brought any other lawsuits in a federal court while a prisoner: ☒ Yes ☐ No
2. If your answer to "1." is yes, how many? 2

Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on an attached piece of paper using the same outline.)

2:23-cv-00013-FLA-SP

2:23-cv-00155-KJM-DMC

42 U.S.C. § 1983

Parties to this previous lawsuit: Plaintiff - Ismail Mora

Court: U.S. District Court  
Eastern District of California

v. Defendants - Christopher Desimone, Frank Neri,  
Shawn Overby

Judge: Magistrate Judge Dennis M. Cota

Date of Filing: 01-26-23

Chief District Judge Kimberly J. Mueller

Disposition:

Pending

- a. Parties to this previous lawsuit:  
Plaintiff Ismail Mora
- Defendants John Doe Sheriff, County of Ventura
- b. Court United States District Court Central District of California
- c. Docket or case number 2023-cv-00013-FLA-SP
- d. Name of judge to whom case was assigned Judge Fernando L. Aenlle-Rocha
- e. Disposition (For example: Was the case dismissed? If so, what was the basis for dismissal? Was it appealed? Is it still pending?) Pending
- f. Issues raised: Assault by a deputy sheriff employed by Riverside County Ventura
- g. Approximate date of filing lawsuit: 01-05-23
- h. Approximate date of disposition Pending

#### B. EXHAUSTION OF ADMINISTRATIVE REMEDIES

1. Is there a grievance procedure available at the institution where the events relating to your current complaint occurred? ☒ Yes ☐ No
2. Have you filed a grievance concerning the facts relating to your current complaint? ☒ Yes ☐ No  
If your answer is no, explain why not N/A
3. Is the grievance procedure completed? ☐ Yes ☒ No  
If your answer is no, explain why not I turned in a grievance but nobody came and spoke to me regarding the issue nor did I get any acknowledgement or response of the grievance.
4. Please attach copies of papers related to the grievance procedure.

#### C. JURISDICTION

This complaint alleges that the civil rights of plaintiff Ismail Mora  
who presently resides at Corcoran State Prison (print plaintiff's name)  
(mailing address or place of confinement)  
were violated by the actions of the defendant(s) named below, which actions were directed against plaintiff at  
Riverside County Jail(s) in Riverside County  
(institution/city where violation occurred)

on (date or dates) 12-30-19 (Claim I), 06-26-20 (Claim II), 12-30-19 to present (Claim III).

NOTE: You need not name more than one defendant or allege more than one claim. If you are naming more than five (5) defendants, make a copy of this page to provide the information for additional defendants.

1. Defendant Sheree Williams (full name of first defendant) \_\_\_\_\_ resides or works at  
1627 S. Hargrave St. Banning, CA 92220 (full address of first defendant) \_\_\_\_\_  
Correctional Deputy II. Williams #N4935 (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This defendant was a sworn peace officer/deputy sheriff working as law enforcement in the state of California, county of Riverside

2. Defendant Zachery Reynoso (full name of first defendant) \_\_\_\_\_ resides or works at  
1627 S. Hargrave St. Banning, CA 92220 (full address of first defendant) \_\_\_\_\_  
Correctional Deputy Reynoso ID #5714 (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This defendant was a sworn peace officer/deputy sheriff working as law enforcement in the state of California, county of Riverside

3. Defendant Placito (full name of first defendant) \_\_\_\_\_ resides or works at  
1627 S. Hargrave St. Banning, CA 92220 (full address of first defendant) \_\_\_\_\_  
Correctional Deputy II Placito ID #N4946 (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This individual was a sworn peace officer/deputy sheriff working as law enforcement in the state of California, county of Riverside at the time of the incident(s) in question.

4. Defendant John Doe 1 \_\_\_\_\_ resides or works at \_\_\_\_\_  
(full name of first defendant)  
Robert Presley Detention Facility  
(full address of first defendant)  
John Doe Sheriff  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This defendant was a law enforcement officer employed in Riverside

5. Defendant John Doe 2 \_\_\_\_\_ resides or works at \_\_\_\_\_  
(full name of first defendant)  
Robert Presley Detention Facility  
(full address of first defendant)  
John Doe Sheriff  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This defendant was a law enforcement officer employed in Riverside

6. Defendant John Doe 3 \_\_\_\_\_ resides or works at \_\_\_\_\_  
(full name)  
Robert Presley Detention Facility  
(full address)  
John Doe Sheriff  
(defendant's position)

The defendant is sued in his ☒ individual ☒ official capacity  
Law

This defendant was a law enforcement officer employed in Riverside.

7. Defendant - County of Riverside

The defendant is sued in his/her ☒ individual ☒ official capacity

Explain how this defendant was acting under color of law:

Has Jurisdiction



8. Defendant - Mayor of Riverside resides or works at  
3900 Main St, Riverside, CA 92522  
The defendant is sued in his official and Individual capacity

Explain how this defendant was acting under color of law:

This defendant is directly responsible for public safety  
and the well being of Riverside's citizens.

9. Defendant - Deputy Santana resides or works @ Riverside County Jail  
~~The defendant is being sued in his official and Individual capacity~~

Explain how this defendant was acting under color of law,

This person is employed as a law enforcement officer.

10. Defendant - Jaime Ortiz resides or works @ Riverside county jail,  
The defendant is sued in his official and independent capacity.  
Explain how this defendant was acting under color of law.

This defendant was employed as a law enforcement  
officer during the time the incident(s) occurred.

**D. CLAIMS\***

**CLAIM I**

The following civil right has been violated:

On 12/30/2019, approximately 02:30 A.M, my constitutional rights were violated. The initial violation took place when, upon entering one of Riverside county's detention facility(s), I was assaulted by Riverside sheriffs. Deputy Ortiz initiated the assault by pulling my arm intentionally and forcefully, [causing me to react automatically] Deputy Williams, Deputy Reynoso, Deputy Placito, and Deputy Santana all unreasonably acted, and their deliberate indifference and outrageous actions led to the infliction of emotional distress. Specifically, Deputy Ortiz force fully pulled my arm while I was waiting by the fingerprint machine, in an attempt to create a hostile environment, in which I, the plaintiff appear to be the assailant. Deputy Ortiz continues to pull me and we engage in brief physical combat. Deputy Reynoso then proceeds to assist Deputy Ortiz in "subduing" me. Both deputies manage to take me to the ground. Deputies Williams, Placito, and Santana assist Ortiz and Reynoso while I'm on the ground.

Supporting Facts: Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be certain you describe, in separately numbered paragraphs, exactly what each DEFENDANT (by name) did to violate your right.

While I'm on the ground, Deputy Santana illegally and maliciously puts his knee on my neck (restricting my breathing) for a considerable amount of time. This was slowly suffocating me, a clear violation of my 14<sup>th</sup> amendment. At some point, Deputy Reynoso throws a punch directed at my ribs. There was no need for any of these actions as I was not resisting. The deputies then decide to pick me up and carry me to a chair, strap me to said chair and leave me there for what seemed to be a long time. Strapped to this chair, I endured psychological distress and suffered from a major depressive episode as I had flashbacks of childhood abuse.

Later that day, on a taped recording between Miller and three other deputies (Ortiz, Williams, Reynoso), these deputies falsify reports. Specifically, Deputy Ortiz stated "he slightly turned toward me and said 'what the fuck did you say'". Deputy Williams states to Miller, "Trying to control his feet, He's kicking moving and"

\*If there is more than one claim, describe the additional claim(s) on another attached piece of paper using the same outline.



Claim I #36 (continued)

Deputy Reynoso states to Miller, "I was standing about, I'd say, ten feet away from where the subject was with Deputy Williams, um and then Deputy Ortiz approach him. Um, at which time, uh the inmate, um said verbal cues towards Deputy Ortiz." All of these statements provided to Miller, were an inaccurate version of what really happened. This led to my solitary confined incarceration, and with that, much emotional distress. During my trial, throughout the summer months including August of 2020, Deputy Williams gives false testimony in attempt to false imprison me, and, or cause emotional and psychological distress and turmoil. Deputy Ortiz also provides false testimony during trial. An example of, is when the two deputies try to fabricate the beginning of my booking process by alleging the computer wasn't working when in reality I had already been fingerprinted. Deputy Williams say I was "uncooperative" and, "passive aggressive" by refusing to answer questions. I answered what basic questions they asked me such as my name, D.O. B, (etc.)

These deputies participated in Defamation and that, along with the unreasonable/excessive use of force, as well as my wrongful solitary confinement is the direct cause of my injuries and emotional distress. I was housed in solitary confinement for 10 months because of the allegations of Ortiz and his accomplices. I tried to commit suicide for the first time in my life. Also, I have mental health problems that arised months after these harsh, critical moments of my life. I've had seizures, cried until my brain hurt, and stressed inwardly and outwardly to the point of subtle pain in my body, and now ultimately suffer from a form of PTSD making me undesirable as an employee. All this is due to the extreme and outrageous conduct by Riverside.

1 Sheriffs, mainly Deputy Ortiz, Deputy Williams, as well as Deputy Santana  
2 and Reynoso. It is extreme because the allegations were known to  
3 be false and these deputies are sworn in "peace" officers. It is also  
4 extreme due to the consequences (me being detained wrongfully facing  
5 11 years on false charges). It is outrageous because I did not  
6 provoke none of the defendants. It seems they seek to punish me  
7 for who I am, not what I did. My mental health has  
8 deteriorated rapidly at the slightest idea or thought process.

9 I endured so much stress and confusion throughout most  
10 of 2020. Coincidentally after the incident on 12-20-2019, a  
11 couple days later I am plainly and obviously assaulted again  
12 on my way into Ventura County Jail on 01-02-2020. To me  
13 this is not a coincidence as none of these things ever happened  
14 prior and a few days apart I am assaulted on two separate  
15 occasions. My 8<sup>th</sup> amendment ensures I am protected from  
16 cruel & unusual punishment and that along with my 14<sup>th</sup> amendment  
17 were violated by the misconduct of the named defendants.  
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3 On June 26, 2020 my 21<sup>st</sup> birthday, I was woken  
4 up by a small explosive. No directives WERE given to me. I wasn't  
5 given an opportunity to cuff up or comply before force was used.

6 So at Riverside County Jail, Robert Presley on the Ad-Seg  
7 unit, John Doe 1 threw a tear gas bomb into my cell while  
8 I was sleeping, violating my 14<sup>th</sup> amendment. The time was after  
9 12:00 am but before 6:00 am, a time we are usually left to sleep.

10 I woke up disoriented and fell off the bed. I rolled underneath  
11 it in an attempt to minimize the damage to my person. I  
12 immediately felt short of breath and knew something was wrong. I  
13 have asthma but this felt much worse than a regular attack.

14 I heard a directive, which I was assuming for me to cuff up,  
15 and I found my way to the door. I cuffed up, the door  
16 opened and I was pushed into a wheel chair. John Doe 2 had  
17 their hands on my head/neck, constantly applying pressure. The  
18 way my neck was held was as if they were going to attempt to  
19 snap my neck or otherwise brutalize my body. There was no need  
20 to be so outwardly aggressive as I was not resisting, I made no  
21 threats, and I was not being violent in any way shape or form.

22 John Doe 2 was pushing me to an unknown location.

23 John Doe 3, I seen through small intervals of squinting, was  
24 holding a camera throughout this ordeal.

25 John Doe 1 for the sake of arguement (if not for John Doe 4)  
26 proceeded to cut all my clothes off until I was butt naked  
27 amongst at least three individuals, one being a woman. I could  
28 not see very well because the tear gas was obscuring my vision.

Claim II (continued)

Next, I was thrown on the ground of a suicide cell despite the fact that I did not claim to be suicidal or homicidal. This is another example of extreme & outrageous conduct with reckless disregard of the possibility of causing emotional distress. I felt humiliated to get my clothes ripped and torn off of me. Honestly, at some point after the initial incident, I remember thinking that this is what a "rape victim" must feel like. The emotional distress was immediate but the extent of my injury(s) was not yet obvious. I was left in the cell for over 24 hours.

Several months later, I started having nightmares and seizures. I never had a seizure in my life until these things happened to me. I would wake up shaking involuntarily and uncontrollably. I would have vivid nightmares that were extremely violent and ended with me or my opponent dying. I would have daydreams as well. I would and sometimes still do have recollections of war or gruesome events that I never speculated or participated in myself. I would cry for no other reason than my apparent loneliness and unusual confinement.

Around the time these physiological injuries were becoming evident, around (April 2021), I was seeking professional help. I may not be able to hold a job in the future because my mental breakdowns and ~~hallucinations~~ hallucinations are frequent and extreme to the point where I will need professional care, possible 72 hour psych evaluation multiple times a year. My dependability as an employee is not up to par. My reactions to directives given, the idea of an authority figure, all give questionable responses that vary.



Also, sometimes I am unable to separate my thoughts from reality rendering me unhirable. I would categorize my overall work potential as unstable, and that status is due directly by the harm done by the defendants. The mayor is at fault because he oversees a community of people and they are subject to incarceration for correction and rehabilitation. Instead the treatment I got was the opposite. The things done to me in county jail made me worse. The mayor does not do an adequate job of making sure the jails have the most Responsible, Professional, Empathetic, Adverse individuals to ensure a safe place for the accused.



**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following specific relief:

I am asking for 6 million dollars. I will not be able to have a job in the future and this six million will ensure I am secure for the rest of my life. Any future medical bills/psychotherapy will be able to be paid as well. I could have easily played professional football and this ruined my chances completely. I would like to be compensated for the government making me ineligible for a lot of work. I am unhireable because of my mental health. I would like to be fairly compensated for my injuries. The mayor and the other defendant Riverside County or the people of Riverside are reasonably accountable for any wrongdoing that could have been avoided by having honor and dignity. I am being degraded by this process offered by our current government system because the set up puts me at a huge disadvantage from a whole lot of perspectives. I refuse to let my talent and rightful opportunity of wealth and prosperity be rejected by any group of people. I know my worth and with that being said I am asking for a price that is much lower than I would have realistically made if I pursued my career, yet I am considerate of other factors. Six million is fair.

03-14-23

(Date)

Samuel Moya

(Signature of Plaintiff)

Ismail Aaron Mora  
FULL NAME

COMMITTED NAME (if different)

Corcoran State Prison  
FULL ADDRESS INCLUDING NAME OF INSTITUTIONP.O. Box 3476Corcoran, CA 93212  
PRISON NUMBER (if applicable)LDC # BM6614

First Amended Complaint

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIAIsmail Mora

PLAINTIFF,

v.

Sheree Williams et al,

DEFENDANT(S).

CASE NUMBER

5:22-cv-02267-WC-DFM  
To be supplied by the Clerk

## CIVIL RIGHTS COMPLAINT

PURSUANT TO (Check one)

☒ 42 U.S.C. § 1983☐ Bivens v. Six Unknown Agents 403 U.S. 388 (1971)

## A. PREVIOUS LAWSUITS

1. Have you brought any other lawsuits in a federal court while a prisoner: ☒ Yes ☐ No2. If your answer to "1." is yes, how many? 2

Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on an attached piece of paper using the same outline.)

2:23-cv-00013-FLA-SP42 U.S.C. § 19832:23-cv-00155-KJM-DMCParties to this previous lawsuit: Plaintiff - Ismail MoraCourt: U.S. District Court  
Eastern District of Californiav. Defendants - Christopher Desimone, Frank Neri,  
Shawn OverbyJudge: Magistrate Judge Dennis M. CotaDate of filing: 01-26-23Chief District Judge Kimberly J. Mueller  
CIVIL RIGHTS COMPLAINT

Disposition:

Pending

- a. Parties to this previous lawsuit:  
Plaintiff Ismail Mora
- Defendants John Doe Sheriff, County of Ventura
- b. Court United States District Court Central District of California
- c. Docket or case number 2023-cv-00013-FLA-SP
- d. Name of judge to whom case was assigned Judge Fernando L. Renlle-Rocha
- e. Disposition (For example: Was the case dismissed? If so, what was the basis for dismissal? Was it appealed? Is it still pending?) Pending
- f. Issues raised: Assault by a deputy sheriff employed by Riverside County Ventura
- g. Approximate date of filing lawsuit: 01-05-23
- h. Approximate date of disposition Pending

#### B. EXHAUSTION OF ADMINISTRATIVE REMEDIES

1. Is there a grievance procedure available at the institution where the events relating to your current complaint occurred? ☒ Yes ☐ No
2. Have you filed a grievance concerning the facts relating to your current complaint? ☒ Yes ☐ No  
If your answer is no, explain why not N/A
3. Is the grievance procedure completed? ☐ Yes ☒ No  
If your answer is no, explain why not I turned in a grievance but nobody came and spoke to me regarding the issue nor did I get any acknowledgement or response of the grievance.
4. Please attach copies of papers related to the grievance procedure.

#### C. JURISDICTION

This complaint alleges that the civil rights of plaintiff Ismail Mora  
(print plaintiff's name)  
who presently resides at Corcoran State Prison  
(mailing address or place of confinement)  
were violated by the actions of the defendant(s) named below, which actions were directed against plaintiff at  
Riverside County Jail(s) in Riverside County  
(institution/city where violation occurred)



on (date or dates) 12-30-19 (Claim I), 06-26-20 (Claim II), 12-30-19 to present (Claim III).

**NOTE:** You need not name more than one defendant or allege more than one claim. If you are naming more than five (5) defendants, make a copy of this page to provide the information for additional defendants.

1. Defendant Sheree Williams (full name of first defendant) resides or works at  
1627 S. Hargrave St. Banning, CA 92220 (full address of first defendant)  
Correctional Deputy II. Williams #N4935 (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This defendant was a sworn peace officer/deputy sheriff working as law enforcement in the state of California, county of Riverside

2. Defendant Zachery Reynoso (full name of first defendant) resides or works at  
1627 S. Hargrave St. Banning, CA 92220 (full address of first defendant)  
Correctional Deputy Reynoso ID #5714 (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This defendant was a sworn peace officer/deputy sheriff working as law enforcement in the state of California, county of Riverside

3. Defendant Placito (full name of first defendant) resides or works at  
1627 S. Hargrave St. Banning, CA 92220 (full address of first defendant)  
Correctional Deputy II Placito ID #N4946 (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This individual was a sworn peace officer/deputy sheriff working as law enforcement in the state of California, county of Riverside at the time of the incident(s) in question.

4. Defendant John Doe 1 resides or works at  
(full name of first defendant)  
Robert Presley Detention Facility  
(full address of first defendant)  
John Doe Sheriff  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This defendant was a law enforcement officer employed in Riverside

5. Defendant John Doe 2 resides or works at  
(full name of first defendant)  
Robert Presley Detention Facility  
(full address of first defendant)  
John Doe Sheriff  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

This defendant was a law enforcement officer employed in Riverside

6. Defendant John Doe 3 resides or works at  
(full name)  
Robert Presley Detention Facility  
(full address)  
John Doe Sheriff  
(defendants position)

The defendant is sued in his ☒ individual ☒ official capacity

Explain how this defendant was acting under color of Law  
This defendant was a law enforcement officer employed in Riverside.

7. Defendant - County of Riverside

The defendant is sued in his/her ☒ individual ☒ official capacity

Explain how this defendant was acting under color of law:

Has Jurisdiction

2. Defendant - Mayor of Riverside resides or works at  
3900 Main St, Riverside, CA 92522  
The defendant is sued in his official and Individual Capacity

Explain how this defendant was acting under color of law:

This defendant is directly responsible for public safety  
and the well being of Riverside's citizens.

9. Defendant - Deputy Santana resides or works @ Riverside County Jail  
The defendant is being sued in his official and Individual capacity  
Explain how this defendant was acting under color of law,  
This person is employed as a law enforcement officer.

10. Defendant - Jaime Ortiz resides or works @ Riverside county jail,  
The defendant is sued in his official and independent capacity.  
Explain how this defendant was acting under color of law.  
This defendant was employed as a law enforcement  
officer during the time the incident(s) occurred.



D. CLAIMS\*

CLAIM I

The following civil right has been violated:

On 12/30/2019, approximately 02:30 AM, my constitutional rights were violated. The initial violation took place when, upon entering one of Riverside county's detention facility(s), I was assaulted by Riverside sheriffs. Deputy Ortiz initiated the assault by pulling my arm intentionally and forcefully, [causing me to react automatically] Deputy Williams, Deputy Reynoso, Deputy Placito, and Deputy Santana all unreasonably acted, and their deliberate indifference and outrageous actions led to the infliction of emotional distress. Specifically, Deputy Ortiz forcefully pulled my arm while I was waiting by the fingerprint machine, in an attempt to create a hostile environment, in which I, the plaintiff appear to be the assailant. Deputy Ortiz continues to pull me and we engage in brief physical combat. Deputy Reynoso then proceeds to assist Deputy Ortiz in "subduing" me. Both deputies manage to take me to the ground. Deputies Williams, Placito, and Santana assist Ortiz and Reynoso while I'm on the ground.

Supporting Facts: Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be certain you describe, in separately numbered paragraphs, exactly what each DEFENDANT (by name) did to violate your right.

While I'm on the ground, Deputy Santana illegally and maliciously puts his knee on my neck (restricting my breathing) for a considerable amount of time. This was slowly suffocating me, a clear violation of my 14<sup>th</sup> amendment. At some point, Deputy Reynoso throws a punch directed at my ribs. There was no need for any of these actions as I was not resisting. The deputies then decide to pick me up and carry me to a chair, strap me to said chair and leave me there for what seemed to be a long time. Strapped to this chair, I endured psychological distress and suffered from a major depressive episode as I had flashbacks of childhood abuse.

Later that day, on a taped recording between Miller and three other deputies (Ortiz, Williams, Reynoso), these deputies falsify reports. Specifically, Deputy Ortiz stated "he slightly turned toward me and said 'what the fuck did you say'" Deputy Williams states to Miller, "Trying to control his feet, he's kicking moving and"

\*If there is more than one claim, describe the additional claim(s) on another attached piece of paper using the same outline.

Claim I <sup>#48</sup> (continued)

Deputy Reynoso states to Miller, "I was standing about, I'd say, ten feet away from where the subject was with Deputy Williams, um and then Deputy Ortiz approach him. Um, at which time, uh the inmate, um said verbal cues towards Deputy Ortiz." All of these statements provided to Miller, were an inaccurate version of what really happened. This led to my solitary confined incarceration, and with that, much emotional distress. During my trial, throughout the summer months including August of 2020, Deputy Williams gives false testimony in attempt to false imprison me, and, or cause emotional and psychological distress and turmoil. Deputy Ortiz also provides false testimony during trial. An example of, is when the two deputies try to fabricate the beginning of my booking process by alleging the computer wasn't working when in reality, I had already been fingerprinted. Deputy Williams say I was "uncooperative" and "passive aggressive" by refusing to answer questions. I answered what basic questions they asked me such as my name, D.O.B, etc.)

These deputies participated in Defamation and that, along with the unreasonable/excessive use of force, as well as my wrongful solitary confinement is the direct cause of my injuries and emotional distress. I was housed in solitary confinement for 10 months because of the allegations of Ortiz and his accomplices. I tried to commit suicide for the first time in my life. Also, I have mental health problems that arised months after these harsh, critical moments of my life. I've had seizures, cried until my brain hurt, and stressed inwardly and outwardly to the point of subtle pain in my body, and now ultimately suffer from a form of PTSD making me undesirable as an employee. All this is due to the extreme and outrageous conduct by Riverside



Sheriffs, mainly Deputy Ortiz, Deputy Williams, as well as Deputy Santana and Reynoso. It is extreme because the allegations were known to be false and these deputies are sworn in "peace" officers. It is also extreme due to the consequences (me being detained wrongfully facing 11 years on false charges). It is outrageous because I did not provoke none of the defendants. It seems they seek to punish me for who I am, not what I did. My mental health has deteriorated rapidly at the slightest idea or thought process.

I endured so much stress and confusion throughout most of 2020. Coincidentally after the incident on 12-20-2019, a couple days later I am plainly and obviously assaulted again on my way into Ventura County Jail on 01-02-2020. To me this is not a coincidence as none of these things ever happened prior and a few days apart I am assaulted on two separate occasions. My 8<sup>th</sup> amendment ensures I am protected from cruel & unusual punishment and that along with my 14<sup>th</sup> amendment were violated by the misconduct of the named defendants.



On June 26, 2020 my 21<sup>st</sup> birthday, I was woken up by a small explosive. No directives WERE given to me. I wasn't given an opportunity to cuff up or comply before force was used.

So at Riverside County Jail, Robert Presley on the Ad-Seg unit, John Doe 1 threw a tear gas bomb into my cell while I was sleeping, violating my 14<sup>th</sup> amendment. The time was after 12:00 am but before 6:00 am, a time we are usually left to sleep.

I woke up disoriented and fell off the bed. I rolled underneath it in an attempt to minimize the damage to my person. I

immediately felt short of breath and knew something was wrong. I have asthma but this felt much worse than a regular attack.

I heard a directive, which I was assuming for me to cuff up, and I found my way to the door. I cuffed up, the door

opened and I was pushed into a wheel chair. John Doe 2 had their hands on my head/neck, constantly applying pressure. The way my neck was held was as if they were going to attempt to snap my neck or otherwise brutalize my body. There was no need to be so outwardly aggressive as I was not resisting, I made no threats, and I was not being violent in any way shape or form.

John Doe 2 was pushing me to an unknown location.

John Doe 3, I seen through small intervals of squinting, was holding a camera throughout this ordeal.

John Doe 1 for the sake of argument (if not for John Doe 4) proceeded to cut all my clothes off until I was butt naked amongst at least three individuals, one being a woman. I could not see very well because the tear gas was obscuring my vision.

Next, I was thrown on the ground of a suicide cell despite the fact that I did not claim to be suicidal or homicidal. This is another example of extreme & outrageous conduct with reckless disregard of the possibility of causing emotional distress. I felt humiliated to get my clothes ripped and torn off of me. Honestly, at some point after the initial incident, I remember thinking that this is what a "rape victim" must feel like. The emotional distress was immediate but the extent of my injury(s) was not yet obvious. I was left in the cell for over 24

Several months later, I started having nightmares and seizures. I never had a seizure in my life until these things happened to me. I would wake up shaking involuntarily and uncontrollably. I would have vivid nightmares that were extremely violent and ended with me or my opponent dying. I would have day dreams as well. I would and sometimes still do have recollections of war or gruesome events that I never speculated or participated in myself. I would cry for no other reason than my apparent loneliness and unusual confinement.

Around the time these physiological injuries were becoming evident, around (April 2021), I was seeking professional help. I may not be able to hold a job in the future because my mental breakdowns and ~~hallucinations~~ hallucinations are frequent and extreme to the point where I will need professional care, possible 72 hour psych evaluation multiple times a year. My dependability as an employee is not up to par. My reactions to directives given, the idea of an authority figure, all give questionable responses that vary.

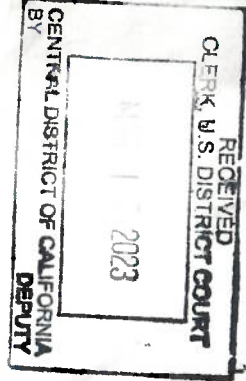
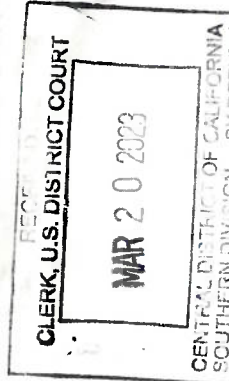


Also, sometimes I am unable to separate my thoughts from reality rendering me unhirable. I would categorize my overall work potential as unstable, and that status is due directly by the harm done by the defendants. The mayor is at fault because he oversees a community of people and they are subject to incarceration for correction and rehabilitation. Instead the treatment I got was the opposite. The things done to me in county jail made me worse. The mayor does not do an adequate job of making sure the jails have the most Responsible, Professional, Empathetic, Adverse individuals to ensure a safe place for the accused.



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